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April 11, 2025

VIA HAND DELIVERY AND ECF

Hon. Rachel P. Kovner
District Judge
United States District Court
225 Cadman Plaza East
Courtroom 4E-N
Brooklyn, New York 11201

**Re: *American Transit Insurance Company v. Pierre*, 1:24-cv-00360-RPK-CLP
Pierre Default Fee Application -- Invoices for *In Camera* Review**

Dear Judge Kovner:

We are counsel to American Transit Insurance Company (“American Transit”), Plaintiff in the above-referenced action. This past Wednesday, American Transit filed its Declaration Concerning Attorney’s Fees and Expenses Plaintiff Incurred For Bradley Pierre’s Default (the “Declaration”) (ECF No. 163), which includes as Exhibit B invoices that were redacted in part for attorney-client and work product privileges. As indicated in the Declaration, we herewith enclose for the Court’s *in camera* review a copy of Exhibit B, without the redactions for privilege. See *ATX Debt Fund I, LLC v Paul*, 19-CV-8540 (JPO), 2024 WL 2093387, at *4 (S.D.N.Y. May 9, 2024) (“courts often review invoices and billing records *in camera* when calculating awards of attorneys’ fees and costs”), *appeal withdrawn sub nom. Tuebor REIT Sub LLC v Paul*, 24-1773, 2024 WL 4482252 (2d Cir. Aug. 6, 2024). The redacted material identified as “Privileged” in the filed copy of Exhibit B (ECF No. 163-2) is highlighted in yellow in the enclosed copy.

Moreover, in preparing the enclosed submission, we noticed that page 62 of the ECF-filed copy of Exhibit B contains a typographical error at my time entry for July 26, 2024. The entry contains a strike through of the time indicated to reduce it to reflect only the work devoted to the Pierre default; however, the entry does not add in the time allocated to the default work as do other similar entries. This oversight does not affect any calculations or sums contained in the Declaration or its exhibits. We herewith attach a corrected page 62, which also appears in the *in camera* submission.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. W. Perkins", written over a horizontal line.

James W. Perkins

Attachment and enclosure

cc: All Counsel of Record (cover letter with attachment only via ECF)

**Corrected Page 62
to Exhibit B
(ECF No. 162-3)**

Invoice No.: 1000740569
 Re: Nexray/Rutland-RICO Complaint
 NON RESPONSIVE

Page 4

Description of Professional Services Rendered

NON RESPONSIVE

07/26/24	Noah Lindenfeld	Analysis of Pierre's motion to vacate default judgment.	0.70	696.50
07/26/24	James W. Perkins	NON RESPONSIVE	1.20	1,620.00
		; emails with J. Persaud, S. Short re: subpoenas, Pierre motion to vacate, status, strategy.	.20	\$270.00
07/27/24	James W. Perkins	Review, comment on Pierre motion to vacate papers; emails with N. Lindenfeld, G. Faldetta re: same; emails with clients re: same.	1.30	1,755.00
07/28/24	James W. Perkins	Emails with D. Filor, J. Molluzzo re: opposition to motion to vacate default.	0.30	405.00
07/29/24	Daniel Filor	Review motion to vacate default papers by B. Pierre PRIVILEGED ; exchange emails with J. Perkins and team PRIVILEGED	1.20	1,590.00
07/29/24	Noah Lindenfeld	Draft preliminary statement to opposition to Pierre's motion for default judgment and conduct research PRIVILEGE	2.20	2,189.00
		PRIVILEGED		
07/29/24	John C. Molluzzo	Correspond with D. Filor regarding PRIVILEGED	0.80	992.00
		Correspond and confer with J. Perkins and N. Lindenfeld regarding resposne to Pierre brief regarding; Correspond with N. Lindenfeld regarding breifing; NON RESPONSIVE	.40	\$496.00